

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA**

In re:

**MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,**

Debtors.

Chapter 11

Case No. 23-00623

Jointly Administered

Objection Deadline: 2/28/2024  
at 4:00 pm *prevailing* CST

**SUMMARY OF FINAL FEE APPLICATION FOR COMPENSATION AND EXPENSE  
REIMBURSEMENT FOR PATIENT CARE OMBUDSMAN  
PERIOD August 10, 2023 – January 31, 2024**

Name of Applicant:	Susan N. Goodman
Authorized to provide professional services:	as <i>Patient Care Ombudsman</i>
Date of Retention:	August 10, 2023
Period of Application:	8/10/2023 through 1/31/2024
Amount of Compensation Sought:	\$50,955.00
Amount of Expense Reimbursement:	\$5,942.63
Application Type:	Final
Amounts Previously Received:	\$24,837.60 fees; \$2,928.18 expense reimbursement

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA

In re:

**MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,**

Debtors.

Chapter 11

Case No. 23-00623

Jointly Administered

**FINAL FEE APPLICATION FOR COMPENSATION AND  
EXPENSE REIMBURSEMENT FOR PATIENT CARE OMBUDSMAN  
PERIOD August 10, 2023 – January 31, 2024**

Susan N. Goodman, as the duly appointed Patient Care Ombudsman (“**PCO**” or “**Applicant**”) comes now and submits this *Final Application for Compensation and Expense Reimbursement for Patient Care Ombudsman* (the “**Application**”) for the period from appointment on August 10, 2023, through January 31, 2024 (the “**Application Period**”). This Application is supported by the following:

**JURISDICTION AND VENUE**

1. This court has jurisdiction of this Chapter 11 proceeding pursuant to 28 U.S.C. §§ 157 and 1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
2. Venue is proper before this court pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory predicates for the relief requested in this Application are Bankruptcy Rule 2016, United States Bankruptcy Code (the “**Bankruptcy Code**”) §§ 330-331, and the court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 244] (the “**Interim Compensation Order**”).

**BACKGROUND**

4. On August 7, 2023 (the “**Petition Date**”) the Debtors filed the petitions for relief under Chapter 11 of the Bankruptcy Code. Debtors continue to operate its business and manage its properties as debtors and debtors-in-possession pursuant to the Bankruptcy Code sections 1107(a) and 1108. No trustee or examiner has been appointed.

5. On August 10, 2023, this court issued its *Order Approving Appointment of Susan N. Goodman as Patient Care Ombudsman* (the “**Appointment Order**”), filed at Docket No. 59 in the lead, jointly administered case docket.

6. Across the Application Period, PCO engaged in three site visits and filed three reports.<sup>1</sup> Between site visits, PCO remained regularly engaged with Debtor team members.

7. In addition to continued remote engagement with Debtor team members, PCO monitored and reviewed docket pleadings at a level consistent with her role and selectively attended hearings with an eye toward balancing the importance of understanding and tracking important case dynamics/milestones with the importance of fiscal stewardship.

### **THE INTERIM COMPENSATION ORDER**

8. On September 14, 2023, the court entered the Interim Compensation Order which established the procedures for case professionals to seek interim compensation and reimbursement of expenses. Consistent with the Interim Compensation Order, PCO filed a total of four monthly fee applications, with the last monthly application filed in advance of the instant Application.

### **COMPENSATION REQUESTED**

9. By this Application, PCO seeks final allowance of professional fees in the amount of \$50,955.00 and expense reimbursement in the amount of \$5,942.63, collectively totaling \$56,897.63 for the Application Period. A copy of the Applicant’s billing summary and detailed time records are attached herein to support the Award request.

10. PCO spent 160.8 hours, billing for 129 hours. Roughly eighty percent (80%) or a total of 129.7 hours of time was spent in activities that classify as general case administration. All 24.5 hours of billable, half-rate non-working travel were written off given the already heightened sensitivity of operational team members toward consultant and executive fees. A total of 6.6 hours were spent on fee associated activities. The time spent in preparation of this Application and the

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<sup>1</sup> *Patient Care Ombudsman’s First Interim Report* was filed September 12, 2023 (the “**First Report**”), at Docket No. 211; *Patient Care Ombudsman’s Second Interim Report* was filed November 12, 2023 (the “**Second Report**”), at Docket No. 504; and, *Patient Care Ombudsman’s Third Interim Report* filed January 12, 2024, at Docket No. 640 (the “**Third Report**”).

Fourth Monthly fee application were not billed. Applicant's expenses are properly categorized as follows:

Expense Category	Amount
Airfare	\$2,020.52
Hotel	\$1,868.54
Car Rental	\$1,324.30
Meals	\$440.07
Parking Fees/Tolls	\$289.20
<b>TOTAL</b>	<b>\$5,942.63</b>

### **BASIS FOR RELIEF**

11. United States Bankruptcy Code § 330(a)(3)-(4)(A) provides an analytical framework to evaluate the reasonableness of professional fees and expenses. The court considers the nature, extent, and value of the services rendered relative to: (1) the time spent, (2) the rates charged, (3) whether the services were necessary or provided a benefit to the estate, (4) the time spent relative to the complexity and nature of the task addressed, (5) whether the professional demonstrated skill and expertise, (6) whether the professional fee is comparatively reasonable, and (7) whether the fee avoids unnecessary duplication and/or waste.

12. If the professional fee requested fails this analysis, the court may reduce the amount of compensation awarded.

13. The Eighth Circuit has utilized the “lodestar” approach to determine if compensation is reasonable, a calculation arrived through multiplying “the reasonable hourly rate by the reasonable number of hours required.” *In re Next Generation Media, Inc.*, 524 B.R. 824, 827, 60 Bankr. Ct. Dec. 153 (Bankr. D. Minn. 2015) *citing Bachman v. Laughlin (In re McKeeman)*, 236 B.R. 667, 671 (B.A.P. 8<sup>th</sup> Cir. 1999). *See also, In re Pothoven*, 84 B.R. 579 (Bankr. S. D. Iowa 1988).

14. PCO's hourly rate of \$395.00 per hour compares favorably to other professionals in this field, particularly so when considering that PCO functions independently because she is a registered nurse, has health care operations experience, and is a health law attorney –providing significant economy to the Estate as a single professional who can evaluate the Debtors' patient care

operation and draft/file pleadings without engagement of local counsel. The PCO provided a vital and necessary service to the Debtors with effective and ongoing oversight of the standard of patient care provided by the Debtors at minimal cost to the Estates. Accordingly, PCO requests this court enter an order allowing and authorizing, on a final basis, the Award of \$56,897.63.

15. PCO has not shared or agreed to share compensation or reimbursement awarded in this case with any other person or entity.

16. No agreement or understanding exists between PCO and any other person for division of compensation.

17. PCO has not entered into any agreement prohibited by U.S.C. Title 18 §155.

18. PCO's compensation and expense reimbursement requested are billed at rates, in accordance with practices no less favorable than those customarily employed by PCO and generally accepted by PCO's clients.

### CONCLUSION

WHEREFORE, Applicant respectfully requests that this court enter an order:

a. awarding PCO, on a final basis, fees for the Application Period, in the amount of \$50,955.00 and awarding expense reimbursement in the amount of \$5,942.63 for a total award of \$56,897.63 for services rendered during the Application Period;

b. authorizing and directing Debtors to pay PCO through Pivot Health Law, LLC, remaining, unpaid fees and expense reimbursement for PCO services rendered and expenses incurred during the Application Period; and,

c. granting such other relief as is just and proper.

DATED: February 7, 2024.

By: /s/Susan N. Goodman, RN JD  
Pivot Health Law, LLC  
Az Bar No. 019483; Tx Bar No. 24117585  
P.O. Box 69734  
Oro Valley, AZ 85737  
Msg: 520.744.7061 | Fax: 520.575.4075  
[sgoodman@pivotohealthaz.com](mailto:sgoodman@pivotohealthaz.com)  
Patient Care Ombudsman

**CERTIFICATE OF SERVICE**

I, Susan N. Goodman, hereby certify that on February 7, 2024, a true and correct copy of the *Final Application for Compensation and Reimbursement of Expenses for Patient Care Ombudsman – Period August 10, 2023, through January 31, 2024*, was filed with the Clerk of Court using Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to parties of this case. PCO will coordinate full service of the Application with the Debtor's noticing agent to minimize service expenses.

DATED: February 7, 2024.

By: /s/Susan N. Goodman, RN JD  
Pivot Health Law, LLC  
Az Bar No. 019483; Tx Bar No. 24117585  
P.O. Box 69734  
Oro Valley, AZ 85737  
Msg: 520.744.7061 | Fax: 520.575.4075  
[sgoodman@pivthealthaz.com](mailto:sgoodman@pivthealthaz.com)  
*Patient Care Ombudsman*

**EXHIBIT A**

**Declaration by Patient Care Ombudsman**

I, Susan N. Goodman, declare as follows:

1. The matters stated in this Declaration are true and correct and within my own personal knowledge and belief. If called as a witness, I could and would competently testify hereto.
2. I am an attorney licensed to practice law in Arizona and Texas and am before the court in these jointly administered cases as the patient care ombudsman.
3. I have prepared this Application and have personal knowledge of the facts set forth in it. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information, and belief.
4. My firm has no agreement, directly or indirectly, and that no understanding exists in any form or guise with any person for a division of the fee or compensation requested herein.

I declare under penalty of perjury under the laws of the United States, and the laws of the State of Iowa, that the forgoing is true and correct and is executed this 7<sup>th</sup> day of February 2024 in Pima County, Arizona.

DATED: February 7, 2024.

By: /s/Susan N. Goodman, RN JD  
Susan N. Goodman



**EXHIBIT B**  
*Fee Statement Summary*

**Case Name: Mercy Hospital, Iowa City, IA**  
**Case No: ND IA 23-00623-JA**  
**08/10/2023 - 11/30/2023**

Cumulative Totals to Date				
FEES BILLED	COSTS BILLED	HOLDBACK	FEES PAID	COSTS PAID
\$41,554.00	\$5,301.99	\$8,310.80	\$17,380.00	\$1,932.80

<b>Date:</b>	<b>7-Feb-24</b>	<b>Objection Deadline:</b>	<b>28-Feb-24</b>
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MO/YR	PROFESSIONAL	RATE/HR	HOURS BILLED	TOTAL	HOLDBACK	AMT DUE
Aug-23	SUSAN N. GOODMAN	\$395.00	31.7	\$12,521.50	\$2,504.30	\$10,017.20
Sep-23	SUSAN N. GOODMAN	\$395.00	23.3	\$9,203.50	\$1,840.70	\$7,362.80
Oct-23	SUSAN N. GOODMAN	\$395.00	23.6	\$9,322.00	\$1,864.40	\$7,457.60
Nov-23	SUSAN N. GOODMAN	\$395.00	26.6	\$10,507.00	\$2,101.40	\$8,405.60
	<b>TOTAL FEES</b>			\$41,554.00	\$8,310.80	\$33,243.20
	<b>TOTAL COSTS</b>			\$5,301.99	N/A	\$5,301.99
	<b>AMOUNT DUE</b>			<b>\$46,855.99</b>		<b>\$38,545.19</b>





**EXHIBIT B**  
*Fee Statement Summary*

**Case Name: Mercy Hospital, Iowa City, IA**

**Case No: ND IA 23-00623-JA**

**12/01/2023 - 1/31/2024**

Cumulative Totals to Date				
FEES BILLED	COSTS BILLED	HOLDBACK	FEES PAID	COSTS PAID
\$50,955.00	\$5,942.63	\$10,191.00	\$24,837.60	\$2,928.18

<b>Date:</b>	<b>7-Feb-24</b>	<b>Objection Deadline:</b>	<b>28-Feb-24</b>
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MO/YR	PROFESSIONAL	RATE/HR	HOURS BILLED	TOTAL	HOLDBACK	AMT DUE
Dec-23	SUSAN N. GOODMAN	\$395.00	3.9	\$1,540.50	\$308.10	\$1,232.40
Jan-24	SUSAN N. GOODMAN	\$395.00	19.9	\$7,860.50	\$1,572.10	\$6,288.40
	<b>TOTAL FEES</b>			\$9,401.00	\$1,880.20	\$7,520.80
	<b>TOTAL COSTS</b>			\$640.64	N/A	\$640.64
	<b>AMOUNT DUE</b>			<b>\$10,041.64</b>		<b>\$8,161.44</b>



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

Exhibit C

# Invoice

**Invoice #:** 1286

**Invoice Date:** 9/9/2023

**Bill To:**

Mercy Hospital, Iowa City, Iowa  
ND IA Case No. 23-00623 (JA)  
File #15224

Period: August 10 - 31, 2023

Date	Description	Hours/Qty	Rate	Amount
8/6/2023	Initial call with AUST re possible appt in Mercy Hospital case - review experience and approach	1.1	0.00	0.00
8/8/2023	Pre appt effort: prepare verified stmt disinterest (.5); review locations and build location listing (1.0); check in with DIA for names of acute team with director (.2)	1.7	0.00	0.00
8/9/2023	Intro call IA Debtor counsel (.5); revise VS (.2)	0.7	395.00	276.50
8/11/2023	Prepare NOA and engage with clerk staff re ECF access (.2); Intro EML requesting leadership intro (.1)	0.3	395.00	118.50
8/11/2023	Docket monitoring and pleading review consistent with role DE 69 and 70 (NC); EML exchanges with counsel and leadership re intro meeting (.2)	0.2	395.00	79.00
8/14/2023	Docket monitoring and pleading review w EML reviews of stipulated Epiq order; bid procedures; 1st day hearings and follow up orders (.4); DE 96 motion for examiner (.3)	0.7	395.00	276.50
8/15/2023	Introductory call Debtor team (.7); docket monitoring and pleading review consistent with role w/ updates to documents for interested party notices (.2);	0.9	395.00	355.50
8/21/2023	Docket monitoring and pleading review/analysis with document updates for appearances DE 114, 117, 122, 123, 124, 128 (.3);	0.3	395.00	118.50
8/23/2023	docket review of interim comp procedures motion with notice list (.2); docket monitoring other pleadings with appearance and calendar updates (DEs 138 - 151) (.2)	0.4	395.00	158.00

**Total**

**Payments/Credits**

**Balance Due**



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1286  
**Invoice Date:** 9/9/2023

**Bill To:**

Mercy Hospital, Iowa City, Iowa  
ND IA Case No. 23-00623 (JA)  
File #15224

Period: August 10 - 31, 2023

Date	Description	Hours/Qty	Rate	Amount
8/24/2023	EML from DIA requesting update (.1); call with DIA contact (.3); docket monitoring and pleading review relative to role (DEs 154, 158, 155, 157) (.3); follow up DIA with changes to hearing dates expected (.1)	0.8	395.00	316.00
8/28/2023	1/2 rate NW travel TUS-PHX (2.0); PHX-CID (3.0); CID-IA City (.6) = 5.6/2= 2.7	2.7	395.00	1,066.50
8/28/2023	Docket monitoring and pleading review/document updates relative to role (DE 165-166) pro hac	0.1	395.00	39.50
8/29/2023	Draft patient posting in lieu of personal service (.2); SV day 1: initial mtg CRO/CEO/VP Nsg/Dir Qual (1.8); security (.2); 5th Flr; Pastoral Care (1.2); 4th Flr (.6); Dir Nsg (.4); Dietary/EVS Ops (.5); Initial Mtg CMO (.1);	5	395.00	1,975.00
8/29/2023	SV Day 1, cont'd: Central Sterile (.6); Cath Lab (.7); purchasing (.8); wound center (.3); ED (1.3); hospitalist (.7); tele pt interviews/staff interaction (2.7)	7.1	395.00	2,804.50
8/30/2023	Initial SV day 2: AM stand up (.4); radiology (1.5); CMO (.9); CRO (1.0); OR/PACU (1.0); OB (.9); 3W and hospitalist RN (.7); ICU and debrief with quality (1.1);	7.5	395.00	2,962.50
8/30/2023	No charge additional time with quality (.5) and ICU (3.6)	4.1	0.00	0.00
8/31/2023	SV Day 3: director radiology/cv (1.1); pharmacy (.6); CRO follow up an IT intro (1.5); clinical lab (1.8); facilities (.6); Plaza GI/Neuro (.8); Plaza Bari (.7); Plaza Pulm (.5); 1/2 rate travel to Coraville (.4/2 = .2)	7.8	395.00	3,081.00
8/31/2023	docket monitoring and pleading review at level consistent with role with updates to notice documents - DE 173 NOA (.1); various W&E pleadings (NC)	0.1	395.00	39.50

**Total**

**Payments/Credits**

**Balance Due**



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1286

**Invoice Date:** 9/9/2023

Period: August 10 - 31, 2023

**Bill To:**

Mercy Hospital, Iowa City, Iowa  
ND IA Case No. 23-00623 (JA)  
File #15224

Date	Description	Hours/Qty	Rate	Amount
	Write off 1/2 NW Travel - 2.9 hrs		-1,145.50	-1,145.50
	Professional Fee Subtotal			12,521.50
8/15/2023	MERCY SV1 AIRFARE		267.90	267.90
8/15/2023	MERCY SV1 AIRFARE		360.90	360.90
8/15/2023	MERCY SV1 AIRFARE (add on to make tickets refundable - Allianz)		19.85	19.85
8/28/2023	MERCY SV1 MEALS (PHX Starbucks)		12.71	12.71
8/28/2023	MERCY SV1 MEALS (Micky's)		19.90	19.90
8/29/2023	MERCY SV1 HOTEL (Chauncey 2 nights)		327.96	327.96
8/29/2023	MERCY SV1 PARKING FEES/TOLLS		30.00	30.00
8/29/2023	MERCY SV1 MEALS (hospital cafeteria)		4.77	4.77
8/29/2023	MERCY SV1 MEALS (Micky's)		19.43	19.43
8/30/2023	MERCY SV1 MEALS (Bluebird Diner)		42.94	42.94
8/31/2023	MERCY SV1 HOTEL (IA City Hilton Garden)		176.98	176.98
8/31/2023	MERCY SV1 MEALS (501 1st Ave)		36.64	36.64
8/31/2023	MERCY SV1 MEALS (Hilton Garden IA City)		10.48	10.48
	Total Reimbursable Expenses			1,330.46
<b>Total</b>				<b>\$13,851.96</b>
<b>Payments/Credits</b>				<b>\$0.00</b>
<b>Balance Due</b>				<b>\$13,851.96</b>



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1288

**Invoice Date:** 10/5/2023

**Bill To:**

Mercy Hospital, Iowa City, Iowa  
ND IA Case No. 23-00623 (JA)  
File #15224

Period: September 1 - 30, 2023

Date	Description	Hours/Qty	Rate	Amount
9/1/2023	site visit day 4: 1/2 rate NW travel clinic visits: to williamsburg (.5); to Coraville (.3); to Coraville FP and back (.2); to 1st Ave (.3)/2 = (.6)	0.6	395.00	237.00
9/1/2023	Site visit day 4: Williamsburg (.6); Lab outreach Coraville and IM (1.2); FM Coraville (1.0); Coraville OB (.5); Peds (.7); IRF (.5); 1st Ave IM; walk-in; occ med (2.0)	6.5	395.00	2,567.50
9/1/2023	call with debtor counsel re site visit (.4); 1/2 rate NW travel - to airport (.3); CID to PHX (3.5); PHX to HO (2.0)= 5.8/2 = 2.9	3.3	395.00	1,303.50
9/3/2023	docket monitoring and pleading review at a level consistent with role - DEs 179 - 180 with notice party updates	0.1	395.00	39.50
9/4/2023	Prepare and file 2015.1 pleading (DE 185)	0.2	395.00	79.00
9/7/2023	docket monitoring and pleading review relative to role with follow up re noticed parties (DE 193-94); Obj review high level for case dynamics (DE 189-195); support doc DE 196 - EML exchanges re lab specimen issue with mayo reference lab - loop in debtor counsel	0.4	395.00	158.00
9/8/2023	update UST re site visits (.6); docket monitoring and pleading review at level consistent with role DEs 197-98; DE 200-203 (.3)	0.1	395.00	39.50
9/8/2023		0.9	395.00	355.50
9/9/2023	Mercy Exhib B preparation (.3)	0.3	395.00	118.50
9/11/2023	EML fr lab director re cancel ref lab account and specimen (.1); EML exchgs follow up with debtor counsel and lab re resolution (.2); DE 204 revised bid proced high level review(.1); continue drafting initial report (.9)+(.2); TXT (.1) and EML follow up with clinical leaders for report and larger EML to leadership re site visit and thoughts (.2); DE 206 re cash collat hrg continue and sched follow up (.1)	1.9	395.00	750.50

**Total**

**Payments/Credits**

**Balance Due**



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1288

**Invoice Date:** 10/5/2023

**Bill To:**

Mercy Hospital, Iowa City, Iowa  
ND IA Case No. 23-00623 (JA)  
File #15224

Period: September 1 - 30, 2023

Date	Description	Hours/Qty	Rate	Amount
9/12/2023	finish initial report rough draft (1.8); EML rough draft CRO for review (.1); EML fr CRO with report edits/accuracy review (.1); Call CRO re same (.6); follow up clinic nurse leaders re est PCP lives (.3); revise /finalize rough initial report draft (.7) EML exec team and file (.2)	3.8	395.00	1,501.00
9/13/2023	EML filed PCO report to clinical mgr team (.2); attend hearing via phone (1.9); DE 212 NOA and document updates (.1); clarify court law clerk safety comment and process to request appearance (.2); follow up CRO post hearing (.2); follow up EML clinic exec re PCP lives #s (.1);	2.7	395.00	1,066.50
9/14/2023	Call fr TK HR Dir to reschedule intro (.1); EML fr DIA requesting debrief meeting (.1); Docket monitoring and calendar updates [DEs 218 - 235] (move cash collateral hrg) (.2)	0.4	395.00	158.00
9/15/2023	update call DIA Director (.9); debrief visit call VP Nsg (1.1); Mercy DE 238 - 240 and document updates (.1); TXT Debtor counsel and CRO request call re staffing co lag time (.1); Debtor counsel call follow up re foundation \$, OB doc feedback, staffing (.5); follow up call Kim/Keri with intro via TXT to include debtor counsel (.3)	3	395.00	1,185.00
9/17/2023	EML Roy Leaf re Medifis (.1); follow up call staffing discussion (.2)	0.3	395.00	118.50
9/18/2023	Docket monitoring and pleading review at high level relative to role to track case happenings and potential patient care impacts ([DE 247-48] (.1)	0.1	395.00	39.50

**Total**

**Payments/Credits**

**Balance Due**



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1288

**Invoice Date:** 10/5/2023

**Bill To:**

Mercy Hospital, Iowa City, Iowa  
ND IA Case No. 23-00623 (JA)  
File #15224

Period: September 1 - 30, 2023

Date	Description	Hours/Qty	Rate	Amount
9/20/2023	Docket monitoring, pleading review, calendar and notice document follow-up consistent with case role DE 260 NOA; DE 258 NOA; DE 256 NOA (.3); review DE 261, 264, 265 (.3)	0.6	395.00	237.00
9/21/2023	TXT follow up unit manager team and nurse executive re continued efforts to stabilize agency staffing (.2)	0.2	395.00	79.00
9/22/2023	docket monitoring and document updating for DE 267 pro hac motion (McKesson)	0.1	395.00	39.50
9/25/2023	EML to interim HR director re call and to health system advocate re same	0.1	395.00	39.50
9/26/2023	Review DE 275 re enforcement stay to staffing agencies	0.2	395.00	79.00
9/28/2023	EML exchg with interim CEO to arrange status call (.1)	0.1	395.00	39.50
9/29/2023	Call with hospital advocate to introduce role and track complaints relative to BK (.5); docket monitoring, pleading review, and document updates relative to role - DEs 282 - 285 (.1); McKesson Obj DE 295 (.1); call with unit mgr re staff update (.2)	0.9	395.00	355.50
	Professional Fees Subtotal			10,586.00
	Write off 1/2 NW Travel - 3.5 hrs		-1,382.50	-1,382.50
	Professional Fees Subtotal after Discount			9,203.50
9/1/2023	MERCY SV1 HOTEL		157.28	157.28
9/1/2023	MERCY SV1 CAR RENTAL (Fuel)		21.89	21.89
9/1/2023	MERCY SV1 CAR RENTAL		324.93	324.93
9/1/2023	MERCY SV1 (Phx Sky Harbor Parking)		70.00	70.00
9/1/2023	MERCY SV1 PARKING FEES/TOLLS		5.00	5.00
9/1/2023	MERCY SV1 (Java House CID)		23.24	23.24
	Total Reimbursable Expenses			602.34

**Total** \$9,805.84

**Payments/Credits** \$0.00

**Balance Due** \$9,805.84



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1290  
**Invoice Date:** 11/1/2023

Period: October 1 - 31, 2023

**Bill To:**

Mercy Hospital, Iowa City, Iowa  
ND IA Case No. 23-00623 (JA)  
File #15224

Date	Description	Hours/Qty	Rate	Amount
10/2/2023	Update call with interim CEO (.5); docket monitoring, pleading review, document updates at level consistent with role DE 306, 311, 312, 314, 315, 320 (.2)	0.7	395.00	276.50
10/3/2023	add additional clients DE 321-322 (.1); Mercy hearing (.3); hearing proposed order review and DE 324 NOA (.1); DE 326, 328 and notice document updates (.1)	0.6	395.00	237.00
10/4/2023	Docket monitoring, pleading review, update documents/calendar at level consistent with role - DE 330 name chg; DE 332 NOA; DE 333 auction delay (.2)	0.2	395.00	79.00
10/5/2023	Update w Debtor counsel re case timing relative to report deadlines	0.2	395.00	79.00
10/5/2023	Prepare Exhib B Sept	0.3	395.00	118.50
10/6/2023	docket monitoring, pleading review, and document updates as needed relative to notice/calendaring DEs 336, 338, and 339	0.2	395.00	79.00
10/9/2023	docket monitoring and pleading review/action relative to role DEs 342 and 346 (.2);	0.2	395.00	79.00
10/10/2023	Call with Mercy Unit Mgr Team (.6); EML exchg Dir Rad/CV re staffing (.1); Review DE 352 auction results (.1);	0.8	395.00	316.00
10/11/2023	TXT CRO re auction announcement to staff and follow up review EML and press release (.2); TXT exchg with VP Clinical re same (.1); pre-scheduled update call with Dir Rad/CV Svc re staffing and now auction impact (.5); review Steidler affidav (.1);	0.9	395.00	355.50
10/12/2023	follow up debtors counsel re auction results and transition timing (.5); EML exchg re staff departure and concerns (.2); follow up EML DIA team with auction update (.1) and call w/ Dir (.2);	1	395.00	395.00

**Total**

**Payments/Credits**

**Balance Due**





**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1290

**Invoice Date:** 11/1/2023

Period: October 1 - 31, 2023

**Bill To:**

Mercy Hospital, Iowa City, Iowa  
ND IA Case No. 23-00623 (JA)  
File #15224

Date	Description	Hours/Qty	Rate	Amount
10/13/2023	docket monitoring with document updates to notice (DEs 374-75)	0.1	395.00	39.50
10/15/2023	Manage travel plan regarding clinic coverage (.3); EML exchg Susan/Jane (.1)	0.4	395.00	158.00
10/16/2023	Begin drafting first monthly fee application; cover sheet; associated documents	1.6	395.00	632.00
10/17/2023	docket monitoring and pleading review at level consistent with role - DE 382 re cash collateral (.1); continued pleading drafting/finalization 1st Mo Fee (.3)	0.3	395.00	118.50
10/18/2023	Call fr court clerk re 1st mo fee app and NOBD (.2 NC); prepare and file NOBD (.2); prepare proposed form of order 1st Mo Fee (.2)	0.4	395.00	158.00
10/20/2023	docket monitoring and pleading review/follow-up relative to role - DEs 386, 387, and 390	0.3	395.00	118.50
10/23/2023	Docket monitoring and pleading review to track case dynamics and potential patient impacts - DEs 404, 405, and 408	0.2	395.00	79.00
10/25/2023	NOA at DE 410 and updates (.1); Review and analyze assertions in DE 411 (.3); follow up CMO and VP clinical ops (.1); NOA DE 413 and follow up (.1); TXT follow up CRO (.1); follow up debtor counsel re case pacing and potential patient concerns (.2); EML to ortho counsel re assertions in DE 411; fwd to debtor leadership (.3)	1.2	395.00	474.00
10/26/2023	Call with PACU/OR team re DE 411 assertions and current state (.6); Call with CRO re same (.4); EML response ortho legal with news article - review and analyze same (.4); call with CMO re current state and clinician departures (.4); Brief check in with UST (.1); Call with DON (.4)	2.3	395.00	908.50

**Total**

**Payments/Credits**

**Balance Due**



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1290

**Invoice Date:** 11/1/2023

Period: October 1 - 31, 2023

**Bill To:**

Mercy Hospital, Iowa City, Iowa  
ND IA Case No. 23-00623 (JA)  
File #15224

Date	Description	Hours/Qty	Rate	Amount
10/27/2023	NOA and document updates - DE 421 (.1); review DE 420 change auction result (.1); EML fr OR leadership re ortho cancellation reasons - analytics based on dates relative to auction - respond (.3); prepare and file 2d 2015.1 (.3); Hearing notices and calendar updates DE 423,424 (.1)	0.9	395.00	355.50
10/29/2023	1/2 rate NW Travel (Direct Transit): TUS-PHX (2.0); PHX-CID (3.6); CID-HOTEL (.4) = 6/2 (3.0)	3	395.00	1,185.00
10/30/2023	SV2: 1/2 NW travel for day - Hotel- Solon (.6) + Solon - Tipton (.8) + Tipton - Muskatine (.6) + Muskatine- West Lib (.6) + West Lib - West Branch (.5) + West B - Hotel (.5) = 3.6/2 = 1.8	1.8	395.00	711.00
10/30/2023	SV2: Solon clinic (.7); Tipton clinic (1.2); Muskatine clinic (.8); West Liberty clinic (1.2); West Branch clinic (1.3); Calls with Clinic Ops Dir x2 (.4)	5.6	395.00	2,212.00
10/31/2023	SV2 1/2 travel Hotel-Kolona clinic (.5); Kolona -Plaza (.7); Plaza to Uro (.6); Uro clinic to hotel (.6)= 1.8/2 (1.2)	1.2	395.00	474.00
10/31/2023	SV2: Kolona clinic (1.0); Clinic leadership team mtg (.9); Cardiology team clinic and clinic leadership/quality mtg (including patient interviews (2.1); Urology clinic (1.2)	5.2	395.00	2,054.00
	Discount 1/2 NW Travel		-2,370.00	-2,370.00
	Professional Fee Subtotal			9,322.00
10/10/2023	MERCY SV2 - PHX-CID		426.89	426.89
10/12/2023	MERCY SV 2 AIRFARE (CID to PHX)		222.90	222.90
10/29/2023	MERCY SV2 Hampton Inn Coralville		131.05	131.05
10/29/2023	MERCY SV 2 MEALS - Starbucks PHX		12.33	12.33
10/29/2023	MERCY SV2 MEALS McDonalds Coralville		5.29	5.29
10/30/2023	MERCY SV2 HOTEL - Hampton Inn University		153.04	153.04

**Total**

**Payments/Credits**

**Balance Due**

P.O. Box 69734  
Oro Valley, AZ 85737

**Invoice #:** 1290  
**Invoice Date:** 11/1/2023

Mercy Hospital, Iowa City, Iowa  
ND IA Case No. 23-00623 (JA)  
File #15224

Date	Description	Hours/Qty	Rate	Amount
10/30/2023	MERCY SV2 MEALS - Jimmi Jack's		27.14	27.14
10/30/2023	MERCY SV2 MEALS - Starbucks		9.43	9.43
10/31/2023	MERCY SV2 MEALS - Press		7.31	7.31
	Total Reimbursable Expenses			995.38

<b>Balance Due</b>	<b>\$10,317.38</b>
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**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1297

**Invoice Date:** 12/4/2023

Period: November 1 - 30, 2023

**Bill To:**

Mercy Hospital, Iowa City, Iowa  
ND IA Case No. 23-00623 (JA)  
File #15224

Date	Description	Hours/Qty	Rate	Amount
11/1/2023	SV2: Infus Ctr (.1); Risk Manager (.9); patient and spouse interview (.4); coffee with volunteer re what hearing from patients (.8); Interview St. Mary's knitting group (.4); Interview H&W (.4); Pt Advocate (.7); PACU/OR/Endo team (1.3); CMO (.6); VP Clin Svcs & Clinics (1.1); ED check in (.9)	7.7	395.00	3,041.50
11/1/2023	docket monitoring, pleading review, document/calendar updates as needed: DEs 434 (3); DE 430-433 (.2);	0.5	395.00	197.50
11/2/2023	SV2: ICU Clin Coord (.5); Dir CV/Rad; HR check in; try dietary (.7); 3W (.6); 4C and laundry and Peg HR (.6); ER leadership (.8); Infusion patients interview (.2); Radiology (.5); ICU Mgr (.7); ED Mgr (.5); check in TK leadership (.4); docket monitoring and pleading review DEs 438- 442 (.3);	5.8	395.00	2,291.00
11/3/2023	Mtg with Debtor counsel re patient feedback from SV2 and case status (1.3); manage travel re changes to attend 11/6 hrg (.9); follow up VP Clin Svc (.2); follow up call CEO (.2); follow up attempt tele mgr; reach 3W/4C (.2); 1/2 travel IA City-MDW (car return low cost) (3.5); MDW to AZO (2.5)(elim wkend hotel) (2.5)= 6/2= (3.0)	5.8	395.00	2,291.00
11/4/2023	docket monitoring, pleading review, doc updates DE 445 (.1), 448, 449 (.1), 451, 452, 454 (.1); 455, 456 (.1); DE 457 (.1); DE 459-460 (.4)	0.8	395.00	316.00
11/5/2023	1/2 NW Travel: Manage travel re connecting delay/constructive cancellation and required changes (.5); AZO-GRR (Auto) (1.0); GRR-MDW (flight) (1.0); MDW to CID (Auto) (4.0)= 6.5/2 = 3.3	3.3	395.00	1,303.50

**Total**

**Payments/Credits**

**Balance Due**



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1297  
**Invoice Date:** 12/4/2023

Period: November 1 - 30, 2023

**Bill To:**

Mercy Hospital, Iowa City, Iowa  
ND IA Case No. 23-00623 (JA)  
File #15224

Date	Description	Hours/Qty	Rate	Amount
11/6/2023	Attending hearing (1.8); docket monitoring and pleading review consistent with role - DE 463/464 (.2);	2	395.00	790.00
11/8/2023	Phone fr Rachel and follow up CFO (.2); Bari chair notice and follow up (.3)	0.5	395.00	197.50
11/9/2023	Call with clerk and upload proposed order for 1st mo fee (.1); finish 2d report draft and EML leadership for accuracy review (.8)	0.9	395.00	355.50
11/10/2023	EML fr VP Clin Svcs re report accuracy (.1)	0.1	395.00	39.50
11/12/2023	Prepare Exhib B Oct	0.4	395.00	158.00
11/12/2023	Final review and edits to PCO second report, file	0.5	395.00	197.50
11/17/2023	Review DE 520 for potential timing impact on sale process	0.1	395.00	39.50
11/21/2023	Txt follow up with clinical managers x2 (.1); follow up call clinical manager (.6); additional follow up DON (.4); follow up call sched with CRO (.1)	1.2	395.00	474.00
11/22/2023	Update CRO on staff feedback	0.4	395.00	158.00
11/27/2023	update call with DON (.1); manage travel for 3d site visit (.3)	0.4	395.00	158.00
11/28/2023	Prepare 2d Mo Fee Application - cover, main app, attachments, NOBD (1.7)	1.7	395.00	671.50
11/29/2023	docket monitoring, notice review, with calendar updates - DE 543 hearing notice	0.1	395.00	39.50
12/1/2023	check in follow-up clinic leadership (.1); OR/PACU (.1); Rad/outpt CV with follow-up call (.4); CRO and DE 549 atty withdrawal document mgmt (.1)	0.7	395.00	276.50
	Write down non-working travel (6.3 hours)		-2,488.50	-2,488.50
	Professional Fee Subtotal			10,507.00
11/1/2023	MERCY SV2 MEALS - Pullman Diner		27.07	27.07

**Total**

**Payments/Credits**

**Balance Due**



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1297

**Invoice Date:** 12/4/2023

**Bill To:**

Mercy Hospital, Iowa City, Iowa  
ND IA Case No. 23-00623 (JA)  
File #15224

Period: November 1 - 30, 2023

Date	Description	Hours/Qty	Rate	Amount
11/1/2023	MERCY SV2 MEALS (Hilton Garden Iowa City Cash)		10.00	10.00
11/2/2023	MERCY SV2 HOTEL - Hilton Garden University (3 nights)		460.99	460.99
11/2/2023	MERCY SV2 MEALS - Hilton Garden University		5.00	5.00
11/2/2023	MERCY SV2 MEALS - The Encounter Cafe		13.10	13.10
11/2/2023	MERCY SV2 MEALS - Bluebird Cafe		30.82	30.82
11/3/2023	MERCY SV2 AIRFARE (flight changes to attend Nov 6 Hrg)		179.32	179.32
11/3/2023	MERCY SV2 CAR RENTAL (drop fee MDW)		86.85	86.85
11/3/2023	MERCY SV2 CAR RENTAL - Fuel Shell IN		29.51	29.51
11/3/2023	MERCY SV2 CAR RENTAL - Fuel Shell IL		15.86	15.86
11/3/2023	MERCY SV2 CAR RENTAL - Fuel (MDW to AZO) EXXON		53.61	53.61
11/3/2023	MERCY SV2 -PARKING FEES/TOLLS - Skyway Concessions IL Toll		6.60	6.60
11/3/2023	MERCY SV2 MEALS - The Encounter Cafe		30.76	30.76
11/5/2023	MERCY HEARING AIRFARE - (ORD-CID delayed; unuseable)		-356.90	-356.90
11/5/2023	MERCY HEARING AIRFARE (GRR-MDW Alt for XCL AA)		381.98	381.98
11/5/2023	MERCY HOTEL - HEARING (Doubletree CID)		193.90	193.90
11/5/2023	MERCY SV2 CAR RENTAL (Oct 29 - Nov 3)		467.51	467.51
11/5/2023	MERCY SV2 NATIONAL - (reversed drop fee MDW - Cust Service)		-86.85	-86.85
11/5/2023	MERCY - PARKING FEES/TOLLS (Doubletree CID hourly parking rate)		6.75	6.75
11/5/2023	MERCY HEARING - MEALS (GRR Hudson)		12.78	12.78
11/6/2023	MERCY CAR RENTAL - Fuel (EZ Mart Bondurant IA)		40.95	40.95
11/6/2023	MERCY HEARING - CAR RENTAL		201.94	201.94
11/6/2023	MERCY HEARING- MEALS (EZ Mart Bondurant IA)		4.93	4.93

**Total**

**Payments/Credits**

**Balance Due**



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1297  
**Invoice Date:** 12/4/2023

Period: November 1 - 30, 2023

**Bill To:**

Mercy Hospital, Iowa City, Iowa  
ND IA Case No. 23-00623 (JA)  
File #15224

Date	Description	Hours/Qty	Rate	Amount
11/8/2023	MERCY - SV2/HEARING PARKING FEES/TOLLS (PHX Split)		112.00	112.00
11/12/2023	MERCY SV2 AIRFARE - Refund Seat Charges Cancel Flight		-45.32	-45.32
11/26/2023	MERCY SV2 PARKING FEES/TOLLS - Toll charges		16.85	16.85
11/27/2023	MERCY SV3 AIRFARE (PHX-CID IORQKL)		211.90	211.90
11/27/2023	MERCY SV3 AIRFARE (CID-PHX KQPRQT)		261.90	261.90
	Total Reimbursable Expenses			2,373.81

**Total** \$12,880.81

**Payments/Credits** \$0.00

**Balance Due** \$12,880.81



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1300

**Invoice Date:** 1/13/2024

**Bill To:**

Mercy Hospital, Iowa City, Iowa  
ND IA Case No. 23-00623 (JA)  
File #15224

Period: December 1 - 31, 2023

Date	Description	Hours/Qty	Rate	Amount
12/3/2023	Exhib B preparation Nov 2023	0.3	395.00	118.50
12/5/2023	TXT update DON w/ follow up call (.3); docket monitoring and review DE 553-554 (.1)	0.4	395.00	158.00
12/6/2023	docket monitoring and pleading review relative to role - DE 559 obj bondholder re exclusivity extension (.1);	0.1	395.00	39.50
12/7/2023	call debtor counsel re EHR down time (.3); TXT ED Leadership; chief clinical; follow up debtor counsel txt (.1)	0.4	395.00	158.00
12/8/2023	follow up chief clinical re EHR down time	0.2	395.00	79.00
12/18/2023	Update call with CRO (.5); docket monitoring, update re hearing change (.1);	0.6	395.00	237.00
12/18/2023	Update request to DON (.1)	0.1	395.00	39.50
12/19/2023	Call fr nurse mgr re staffing concerns (.2); f/u call CRO (.1); f/u call with DON and loop back CRO (.3)	0.6	395.00	237.00
12/28/2023	Call fr clinical manager re update staffing and other transition concerns (.5); update call with CRO re same (.3);	0.8	395.00	316.00
12/29/2023	docket monitoring, pleading review, and document updates re notice - DE 609 NOA Stryker (.1); prepare and file 2015.1 pleading (.3)	0.4	395.00	158.00

**Total** \$1,540.50

**Payments/Credits** \$0.00

**Balance Due** \$1,540.50





**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1305  
**Invoice Date:** 2/6/2024

Period: January 1 - 31, 2024

**Bill To:**

Mercy Hospital, Iowa City, Iowa  
ND IA Case No. 23-00623 (JA)  
File #15224

Date	Description	Hours/Qty	Rate	Amount
1/3/2024	1/2 rate NW travel for SV #3: TUS - PHX (2.0); PHX-CID (3.0); CID to IA City .6 = 5.6/2 = 2.7	2.7	0.00	0.00
1/3/2024	check in calls in advance site visit: CRO (.2); VP Nsg (.2); 4C unit mgr (.1)	0.5	395.00	197.50
1/3/2024	update call with Debtor counsel	0.2	395.00	79.00
1/4/2024	SV #3/Day 1: HomeHealth (1.0); Surg/Pulm clinic mgr (.5); Clinic Dir (1.5); ED Dir (.4); HR transition for U (.5); CEO (.2); CRO (.5); VP Clin (.2); Materials (.3); Pharmacy (.4); Quality (.5); OR (.5); 3W (.4); Tele (.6); CT (.2)	7.7	395.00	3,041.50
1/5/2024	SV #3/Day 2: staffing 4C and 3W staff check in (.5); HIM (.3); ICU (.7); HR (.3); Dietary (.3); Women's Ctr (.3); Volunteers (.4); Clinic Ldship CA Ctr (.5); Day Surg (.5); OR/PACU (.3)	4.1	395.00	1,619.50
1/5/2024	follow up call CMO	0.4	395.00	158.00
1/5/2024	1/2 NW Travel: IA City - CID (.6); CID - PHX (3.0); PHX-TUS (2.0); TUS - HO (.6) = 6.2/2 = 3.1	3.1	0.00	0.00
1/8/2024	Begin drafting 3d report draft	1.7	395.00	671.50
1/9/2024	Finish drafting 3d report (.8); EML to leadership team for review (.1)	0.9	395.00	355.50
1/11/2024	Update call CRO re current dynamics and record challenges; report; upcoming hearing	0.2	395.00	79.00
1/12/2024	Prepare 3d Mo Fee (Nov fees) with associated documents (1.3); call with Debtor counsel re report, hearing, record topic (.2); research follow up and record resources to Debtor counsel (.3); final edits to 3d report and file (.2)	2	395.00	790.00
1/12/2024	docket monitoring, pleading review relative to role, document/notice list updates as needed - DE 627 (.1); DE 630, 633, 635 (.2);	0.3	395.00	118.50
1/13/2024	Prepare Dec Exhib B	0.3	395.00	118.50

**Total**

**Payments/Credits**

**Balance Due**



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1305  
**Invoice Date:** 2/6/2024

**Bill To:**

Mercy Hospital, Iowa City, Iowa  
ND IA Case No. 23-00623 (JA)  
File #15224

Period: January 1 - 31, 2024

Date	Description	Hours/Qty	Rate	Amount
1/16/2024	fee analysis and projection through end of case as requested by TK team (.2); pro hac review and document/EML updates re DE 651 (.1); follow up Court re NOBD re DE 641 and correction (.3 NC)	0.3	395.00	118.50
1/17/2024	docket monitoring, pleading review, calendar and document updates consistent with role - DE 659	0.1	395.00	39.50
1/18/2024	Call with Debtor counsel re EHR status and hearing (.2); EML to DIA team re hearing and possible need to attend and DE review 667-669 (.2)	0.4	395.00	158.00
1/22/2024	Attend hearing re various topics - my concern the EHR (1.1 total - discount)	0.6	395.00	237.00
1/22/2024	TXT follow up TK and debtor counsel re hrg (.1);	0.1	395.00	39.50
1/31/2024	Confirm sale closure with TK finance leadership	0.1	395.00	39.50
	Professional Fee Subtotal			7,860.50
1/3/2024	MERCY SV3 AIRFARE (Alt return flight)		351.10	351.10
1/3/2024	MERCY SV3 HOTEL (Hampton Inn)		136.23	136.23
1/3/2024	MERCY SV3 MEALS (McDs)		7.19	7.19
1/3/2024	MERCY SV3 MEALS (Maggies Farm)		30.86	30.86
1/4/2024	MERCY SV3 HOTEL (Hilton Garden Inn)		131.11	131.11
1/4/2024	MERCY SV3 MEALS (Blue Bird)		21.25	21.25
1/5/2024	MERCY SV3 AIRFARE (Refund non-used flight)		-261.90	-261.90
1/5/2024	MERCY SV3 CAR RENTAL		160.16	160.16
1/5/2024	MERCY SV3 CAR RENTAL (Fuel)		7.94	7.94
1/5/2024	MERCY SV3 PARKING FEES/TOLLS (PHX Airport)		42.00	42.00
1/5/2024	MERCY SV3 MEALS (Java House CID)		14.70	14.70
	Total Reimbursable Expenses			640.64

**Total** \$8,501.14

**Payments/Credits** \$0.00

**Balance Due** \$8,501.14